

# Grant Closeouts

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Grants Management Officer



# Topics

- ❑ No - Cost Extensions
- ❑ 2 CFR 215 Subpart D
- ❑ Closeout Procedures
- ❑ Adjustments and Continuing Responsibilities
- ❑ Collections
- ❑ Grant Contacts



# No-Cost Extensions

- ☐ Normally requested to complete activities of the grant.
- ☐ Requests must be in prior to the end of the Project Period.
- ☐ No Cost Extensions are not permitted to merely use unobligated balances.
- ☐ Are one time extensions of the expiration date up to 12 months.
- ☐ You must provide a “letter of justification” providing us with the time needed for the No Cost Extension signed by the authorized official (person who signed 424)
- ☐ May not permit any budget changes in a recipient’s award that caused any FEDERAL APPROPRIATION to be used for purposes other than those consistent with the original award/purpose of the authorization and appropriation.
- ☐ Can run concurrently with “new” awards
  - ☐ Must maintain separate accounting



## 2 CFR Subpart D

- ❑ After-the Award Requirements
  - ❑ 215.71 Closeout Procedures
  - ❑ 215.72 Adjustments and Continuing Responsibilities
  - ❑ 215.73 Collection of Amounts Due



# What is a Grant Closeout?

- ❑ A process by which the federal agency determines that all applicable administrative actions, all terms and conditions, and all required work on the grant have been completed.




# When a Grant Can Not be Closed

- ❑ If it is in litigation or under appeal.
- ❑ Termination has been initiated and all necessary termination actions have not been accomplished.
- ❑ Allowable costs under the grant have not been paid
- ❑ Any unliquidated funds remain in the grant.



# Closeout Procedures

- ☐ Liquidate all obligations incurred within 90 days after the funding period.
- ☐ Submit within 90 days
  - ☐ Final SF-269 reports
  - ☐ Final Program Progress Reports
  - ☐ Property Inventory and Disposition Form
- ☐ Promptly refund any balances of unobligated cash advanced by ACF



# Adjustments and Continuing Responsibilities

- ☐ Closeout does not affect –
  - ☐ Federal agencies ability to disallow costs and recover funds on the basis of a later audit or other review.
  - ☐ The recipients obligation to return any funds due as a result of later refunds, corrections, or other transactions.
  - ☐ Audit requirements
  - ☐ Records Retention
  - ☐ Property Management





# Audit Requirements

## OMB Circular - A-133

- ☐ Non-federal entities that expend \$500,000 or more in a year shall be audited.
  - ☐ \$500,000 is from all Federal sources
- ☐ Frequency of audits - Annual basis
- ☐ Submission - 9 months after your audit period.



# Records Retention

- ❑ Three years from date of submission of final SF-269
- ❑ If litigation or audit started before expiration of 3 year period, then retain until litigation, claims, or audit findings have been resolved.
- ❑ Real Property and equipment for 3 years after disposition.



# Property Management

## ☐ Supplies and other Expendable Property

- ☐ Title to supplies and other expendable property shall vest in the recipient upon acquisition. If there is a residual inventory of unused supplies exceeding \$5000 in total aggregate value upon termination or completion of the project or program and the supplies are not needed for any other federally-sponsored project or program, the recipient shall retain the supplies for use on non-Federal sponsored activities or sell them, but shall, in either case, compensate the Federal Government for its share.
- ☐ See A-110 for guidance on Equipment and Real Property.



# Collection of Amounts Due

- ❑ Any funds paid in excess of that entitled constitute a debt to the government.
  - ❑ If not paid, may reduce the debt by
    - ❑ Administrative offset against other requests for reimbursement.
    - ❑ Withholding advance payments.
    - ❑ Take other action permitted by statute.
    - ❑ Interest is accrued.



# Grants Management Contacts

- ❑ **The Grants Management Specialist identified on your FAA should be called on all financial and non-programmatic aspects of the Grants.**

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